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GABRIEL L. GRASSO, ESQ.
State Bar Number 7358
9525 Hillwood Dr., Suite 190
Las Vegas, Nevada 89134
(702) 868-8866
Attorney for YANCEY

UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DAVID YANCEY,

Defendant.

Case No.: 2:13-cr-00407-KJD-CWH

**UNOPPOSED MOTION TO MODIFY
CONDITIONS OF PRETRIAL
RELEASE**

DAVID YANCEY, (YANCEY) through his attorney, GABRIEL L. GRASSO, ESQ., respectfully files this Unopposed Motion to Modify Conditions of Pretrial Release. Specifically, YANCEY requests the Court allow Pretrial Services to delete the special condition requiring the defendant to remain on location monitoring. This will allow YANCEY to travel out of state for employment purposes.

Gabriel L. Grasso, P.C.
State Bar Number 7358
9525 Hillwood Dr., Suite 190
Las Vegas, NV 89134
(702) 868-8866

/s/ Gabriel L. Grasso
GABRIEL L. GRASSO, Esq.

ARGUMENT

1. On January 31, 2014 the United States District Court for the Western District of Washington released YANCEY on a personal recognizance bond with electronic monitoring as part of the Location Monitoring Program.
2. On February 18, 2014 YANCEY appeared before this Court and entered a not guilty plea. During the entry of his plea, the Court allowed for YANCEY'S electronic monitoring to remain in place under the same conditions of release imposed by the Western District of Washington.
3. This request is for the Court to allow Pretrial Services to delete the special condition requiring the defendant to remain on location monitoring. This will allow YANCEY to travel out of state for employment purposes.
4. Both YANCEY's current Pretrial Officer and AUSA Robert Kneif have no objection to this request.
5. YANCEY respectfully requests this Court allow Pretrial Services to place him on a reasonable daily curfew.

DATED this 18th day of April, 2016.

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/s/ Gabriel L. Grasso
GABRIEL L. GRASSO, Esq.

ORDER

DAVID YANCEY, (YANCEY) through his attorney, GABRIEL L. GRASSO, ESQ., respectfully files this Order Granting Unopposed Motion to Modify Conditions of Pretrial Release. Specifically, this request is for the Court to allow Pretrial Services to delete the special condition requiring the defendant to remain on location monitoring. This will allow YANCEY to travel out of state for employment purposes.

IT IS SO ORDERED.

DATED: April 19, 2016



United States Magistrate Judge